

EXHIBIT L

R. Higgins e-mail correspondence to R. Kraft, dated June 25, 2021

Roger Higgins

From: Roger Higgins
Sent: Friday, June 25, 2021 1:48 PM
To: rk@kraft.legal
Cc: ryan.roman@akerman.com
Subject: RE: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Mr. Kraft,

The facts of the *Daily* case differ significantly from those present in this matter, and the holding is therefore not relevant. Moreover, there is nothing in the complaint you filed to support your allegation.

Finally, the Plan and Confirmation Order specifically contemplate meritless allegations of the type asserted against my client, W. R. Grace & Co. ("Grace") in your complaint. In particular, the Plan and Confirmation Order preclude and forever bar you from asserting any such Administrative Expense Claim against Grace in any forum, whether the Arizona District Court, the Delaware Bankruptcy Court, or otherwise:

based upon any act or omission, transaction, or other activity, event, or occurrence of any kind or nature that occurred prior to the Effective Date, whether or not the facts of or legal bases therefor were known or existed prior to the Effective Date.

Plan Art. 8.1.1.

Please be further advised that, as discussed in my letter of earlier today, if you take any action in the Arizona Litigation other than filing a motion seeking dismissal of Grace with prejudice, Grace reserves the right seek entry of an order by the Delaware Bankruptcy Court imposing sanctions on you for any such violations of the Confirmation Order, including but not limited to attorneys' fees and other expenses arising from Grace's enforcement of the Confirmation Order. *See In re Continental Airlines, Inc.*, 236 B.R. 318 (Bankr. D. Del. 1999) (imposing sanctions for civil contempt in violation of a chapter 11 plan confirmation order).

Warmest Regards. R

Roger J. Higgins
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From: Rune Kraft <rk@kraft.legal>
Sent: Friday, June 25, 2021 12:28 PM
To: Roger Higgins <rhiggins@rogerhigginslaw.com>
Cc: ryan.roman@akerman.com
Subject: RE: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Mr. Higgins,

W.R. Grace & Co. obtained money by fraud and, therefore, not dischargeable in bankruptcy e.g. *In re Daily*, 47 F.3d 365, 368 (9th Cir. 1995).

Thanks,

Rune

KRAFT

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From: Roger Higgins <rhiggins@rogerhigginslaw.com>

Sent: Friday, June 25, 2021 12:49 PM

To: rk@kraft.legal; Ingrid.Aronson@Kraft.Legal

Cc: ryan.roman@akerman.com

Subject: Kraft v. Chevron Corp. et al., Case No. 2:21-cv-00575-DJH (the "Arizona Litigation").

Mr. Kraft:

Please find attached my letter requesting that you file the appropriate pleading or pleadings to dismiss my client, W. R. Grace & Co., and any and all affiliates with prejudice from the litigation captioned *Kraft v. Chevron Corp. et al.*, Case No. 2:21-cv-00575-DJH.

I look forward to your confirming no later than July 2, 2021, that you will file the appropriate pleading or pleadings no later than July 7, 2021.

Please do not hesitate to contact me if you have any questions.

Warmest Regards. R

Roger J. Higgins

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